

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

XINLU FAN, LIANG'E FAN,  
SHAOCHUN FU, JIANHUA GU,  
FENYING LI, MINGXIA LI, YONGNIAN  
SHI, CHENLIN WANG, SHUWEN WU,  
HAIJUN ZHOU, and XIAOFANG ZHOU,

Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION;  
QUARTZBURG GOLD, LP; ISR  
CAPITAL, LLC; IDAHO STATE  
REGIONAL CENTER, LLC; and SIMA  
MUROFF,

Defendants.

U.S. BANK NATIONAL ASSOCIATION,

Crossclaimant,

v.

QUARTZBURG GOLD, LP; and IDAHO  
STATE REGIONAL CENTER, LLC,

Crossclaim  
Defendants.

NO. 2:19-cv-01545-RSM

**STIPULATION AND ORDER  
REGARDING CLASS  
CERTIFICATION DEADLINES**

STIPULATION AND ORDER RE:  
CLASS CERTIFICATION DEADLINES  
2:19-cv-01545-RSM

**DORSEY & WHITNEY LLP**  
701 FIFTH AVENUE, SUITE 6100  
SEATTLE, WA 98104-7043  
PHONE: (206) 903-8800  
FAX: (206) 903-8820

1 Plaintiffs and Defendants identified below, who are all parties who have appeared in this  
2 action, by and through their undersigned counsel, hereby stipulate and agree that the deadline for  
3 the Motion to Certify Class, currently scheduled for June 26, 2020 (Dkt. #30), should be continued  
4 until July 17, 2020, the deadline for any Opposition to Motion to Certify Class, currently scheduled  
5 for July 24, 2020 (Dkt. #30), should be continued until August 14, 2020, and the deadline for any  
6 Reply in Support of Motion to Certify Class, currently scheduled for August 21, 2020 (Dkt. #30),  
7 should be continued until September 11, 2020.

8 Defendant U.S. Bank National Association has noticed the deposition of the putative class  
9 representative and has agreed to take the deposition remotely, over videoconference. However,  
10 Plaintiffs' counsel has represented that the putative class representative cannot be deposed in  
11 China, even remotely, because depositions in China are illegal, and has further represented that the  
12 putative class representative is currently prohibited from traveling to another location for the  
13 deposition at this time due to travel and other restrictions resulting from the global COVID-19  
14 pandemic. The parties agree that there is good cause for this request because U.S. Bank believes  
15 it is entitled to take the deposition of the putative class representative before class certification is  
16 briefed but the putative class representative remains unavailable to be deposed at this time. This  
17 Stipulation is without waiver of any party's right to seek further extensions or other relief. For  
18 these reasons, the parties hereto stipulate and agree to, and respectfully and jointly request entry  
19 of, the Order set forth below.

20 Respectfully submitted this 22nd day of June, 2020.  
21  
22  
23  
24  
25  
26  
27

/s/ Shawn Larsen-Bright

Peter Ehrlichman, WSBA #6591  
Jeremy Larson, WSBA #22125  
Shawn Larsen-Bright, WSBA #37066  
701 Fifth Avenue, Suite 6100  
Seattle, WA 98104-7043  
(206) 903-8800  
ehrllichman.peter@dorsey.com  
larson.jake@dorsey.com  
larsen.bright.shawn@dorsey.com

***Attorneys for U.S. Bank National  
Association***

/s/ Jihee Ahn

John F. Rapp, WSBA #17286  
Daniel P. Harris, WSBA #16778  
Jihee Ahn, WSBA #16778  
John McDonald *admitted pro hac vice*  
Harris Bricken  
600 Stewart Street, Suite 1200  
Seattle, WA 98101  
Tel: 206-224-5657  
Fax: 206-224-5659  
john.rapp@harrisbricken.com  
dan@harrisbricken.com  
jihee@harrisbricken.com  
john.mcdonald@harrisbricken.com  
***Attorneys for Plaintiffs Xinlu Fan, et al.***

/s/ Sean Prosser

Sean T. Prosser, *admitted pro hac vice*  
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo  
3580 Carmel Mountain Road, Suite 300  
San Diego, CA 92130  
STProsser@mintz.com

Roger D. Mellem, WSBA #14917  
Adam Doupe, WSBA #55483  
Ryan, Swanson & Cleveland, PLLC  
1201 Third Avenue, Suite 3400  
Seattle, Washington 98101-3034  
mellem@ryanlaw.com  
doupe@ryanlaw.com

***Attorneys for Defendants Quartzburg Gold,  
LP, ISR Capital LLC and Idaho State  
Regional Center, LLC***

**ORDER**

Based upon the foregoing Stipulation, and for good cause shown, it is hereby ORDERED that the deadline for any Motion to Certify Class is hereby continued to July 17, 2020, that the deadline for any Opposition to Motion to Certify Class is hereby continued to August 14, 2020, and that the deadline for any Reply in Support of Motion to Certify Class is hereby continued to September 11, 2020.

IT IS SO ORDERED this 22<sup>nd</sup> day of June, 2020.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

John F. Rapp, WSBA #17286  
Daniel P. Harris, WSBA #16778  
Jihee Ahn, WSBA #16778  
John McDonald *admitted pro hac vice*  
Harris Bricken  
600 Stewart Street, Suite 1200  
Seattle, WA 98101  
Tel: 206-224-5657  
Fax: 206-224-5659  
john.rapp@harrisbricken.com  
dan@harrisbricken.com  
jihee@harrisbricken.com  
john.mcdonald@harrisbricken.com

- ☐ Via Messenger  
☐ Via Facsimile  
☐ Via U.S. Mail  
☐ Via Electronic Mail (*per agreement*)  
☒ Via ECF Notification

***Attorneys for Plaintiffs Xinlu Fan, et al***

Roger D. Mellem, WSBA #14917  
Adam Doupe, WSBA #55483  
Ryan, Swanson & Cleveland, PLLC  
1201 Third Avenue, Suite 3400  
Seattle, Washington 98101-3034  
mellem@ryanlaw.com  
doupe@ryanlaw.com

- ☐ Via Messenger  
☐ Via Facsimile  
☐ Via U.S. Mail  
☐ Via Electronic Mail (*per agreement*)  
☒ Via ECF Notification

*and*

Sean T. Prosser, *admitted pro hac vice*  
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo  
3580 Carmel Mountain Road, Suite 300  
San Diego, CA 92130  
STProsser@mintz.com

- ☐ Via Messenger  
☐ Via Facsimile  
☐ Via U.S. Mail  
☐ Via Electronic Mail (*per agreement*)  
☒ Via ECF Notification

***Attorneys for Defendants Quartzburg Gold,  
LP, ISR Capital LLC and Idaho State  
Regional Center, LLC***

DATED this 22nd day of June, 2020.

/s/ Molly Price

Molly Price, Legal Assistant